December 17, 2020

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1		SURREBUTTAL TESTIMONY OF
2		ANTHONY D. BRISENO
3		ON BEHALF OF
4		THE SOUTH CAROLINA OFFICE OF REGULATORY STAFF
5		DOCKET NO. 2020-125-E
6		IN RE: APPLICATION OF DOMINION ENERGY SOUTH CAROLINA,
7		INCORPORATED FOR ADJUSTMENT OF RATES AND CHARGES
8	Q.	PLEASE STATE YOUR NAME, BUSINESS ADDRESS, AND OCCUPATION.
9	A.	My name is Anthony D. Briseno. My business address is 1401 Main Street, Suite
10		900, Columbia, South Carolina 29201. I am employed by the State of South Carolina as an
11		Audit Manager for the Office of Regulatory Staff ("ORS").
12	Q.	DID YOU FILE DIRECT TESTIMONY RELATED TO THIS PROCEEDING?
13	A.	Yes. I filed direct testimony with the Public Service Commission of South Carolina
14		on November 10, 2020.
15	Q.	WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY IN THIS
16		PROCEEDING?
17	A.	The purpose of my surrebuttal testimony is to respond to the rebuttal testimony
18		filed by Dominion Energy South Carolina Inc. ("Company" or "DESC") witness Keith
19		Coffer, Jr. on December 2, 2020. Specifically, I will address his responses to ORS
20		recommendations related to classification of the amortization of the deferrals, changes to
21		deferral balances, and the tree trimming and vegetation management accrual.
22	Q.	WHAT IS ORS'S RESPONSE TO WITNESS COFFER'S REBUTTAL
23		TESTIMONY REGARDING THE DEFERRAL AMORTIZATION (PAGE 13,

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Dominion Energy South Carolina, Inc.

LINE 12 THROUGH PAGE 14, LINE 5 AND PAGE 15, LINE 3 THROUGH LINE 9)?

The Company does not object to the removal of the deferral amortizations from the working capital calculation. However, the Company does request that deferral amortizations continue to be recorded to operations and maintenance expense ("O&M") to be consistent with the Federal Energy Regulatory Commission ("FERC") Uniform System of Accounts. ORS does not object to the Company's request to allocate certain portions of the deferrals into O&M for the purposes of FERC reporting. The ORS recommendation to record the deferral amortizations in depreciation and amortization expense is consistent with the manner in which Duke Energy Progress, LLC, and Duke Energy Carolinas, LLC record deferral amortizations and was approved by the Commission in Docket Nos. 2018-318-E, and 2018-319-E. In those dockets, the amortization of all deferrals was included within the depreciation and amortization classification and the amortization expense was not included in the calculation of working capital.

Regarding witness Coffer's request that the established deferral amortization remain in effect until the entire deferral account balance is recovered, ORS does not object to the Company's request provided that ORS is allowed the opportunity to review the additional deferred amounts incurred after May 31, 2020 in a subsequent general rate case. Additionally, ORS requests that the same treatment be afforded to the regulatory liabilities (Adjustment No. 15 GENCO Excess Deferred Income Taxes and Adjustment No. 26 Tax Reform Refund) as is its regulatory assets.

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Q.

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Yes, it does.

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1	Q.	WHAT IS ORS'S RESPONSE TO WITNESS COFFER'S REBUTTAL
2		TESTIMONY STARTING ON PAGE 15, LINE 10 THROUGH PAGE 17, LINE 10
3		ON THE TREE TRIMMING AND VEGETATION MANAGEMENT ACCRUAL?
4	A.	After reviewing the Company's rebuttal testimony, ORS issued and the Company
5		responded, to ORS's Continuing Request for Production of Books, Records and Other
6		Information ("ORS Request") 14. In this request, ORS requested that the Company quantify
7		the hourly work attributable to tree trimming and vegetation management for the five (5)
8		years preceding 2019. Based upon the Company's response ORS concluded that the level of
9		hourly work in the 2019 test year was reasonable. The Company correctly recorded the
10		hourly work separate from the accrual. Based on witness Coffer's additional clarification of
11		the hourly and cyclical work and the additional discovery, ORS accepts the Company's
12		updated adjustment as provided by the Company in response to ORS Request 8-6 which
13		adjusts other O&M expenses by \$3,786,000, income taxes by (\$944,000), and working
14		capital by \$473,000.
15	Q.	WILL YOU UPDATE YOUR SURREBUTTAL TESTIMONY BASED ON
16		INFORMATION THAT BECOMES AVAILABLE?
17	Α.	Yes. ORS fully reserves the right to revise its recommendations via supplemental
18		testimony should new information not previously provided by the Company, or other
19		sources, becomes available.

THE OFFICE OF REGULATORY STAFF 1401 Main Street, Suite 900 Columbia, SC 29201

DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?